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March 25, 2021

Honorable Laura Taylor Swain
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

RE: United States v. Constantinescu
19 Cr. 651 (LTS)

Dear Judge Swain,

We represent Ionela Constantinescu in the above referenced-matter. Ms. Constantinescu is working as a driver for a transportation company. Ms. Constantinescu has been in stellar compliance with all the conditions of her pretrial supervision. She has obtained employment and continues to excel at work. We write to request permission to have her location monitoring condition removed.

MS. Constantinescu's job involves interaction with customers. Having the monitor leads to additional hardships at work and less jobs going her way at times. Ms. Constantinescu is constantly being asked to hide the monitor from customers and is reprimanded when the monitor becomes exposed. This will become even more of a problem as the summer approaches as she will have to continue to wear long pants no matter the temperature.

Ms. Constantinescu has substantial ties here including her children. The pretrial services officer's time and the government's resources required to maintain the monitoring condition could be better allocated elsewhere. Ms. Constantinescu continues to make the most of this Courts decision to grant her bail and her conduct thus far gives reason to anticipate she would use the lifting of this condition to her advantage and the advantage of her family by pursuing advancement at her place of employment.

I communicated with her pretrial services officer and with the government in regards to this request. The government objects to this request. Pretrial services officer Rena Bolin, who interacts with Ms. Constantinescu on a regular basis, has no objection to this request.

Thank you for your consideration.

Respectfully,

_____/S/_____
Jacob Mitchell
Ezra Spilke
Counsel for Ionela Constantinescu

The Government shall file a letter setting forth its objections by March 29, 2021 at 12:00 p.m. Any reply must be filed by March 30, 2021, at 5:00 p.m.

SO ORDERED.

3/25/2021

/s/ Laura Taylor Swain, USDJ